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Attorneys for Plaintiffs
REBEKAH GEARE and RAIN MITCHELL

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

REBEKAH GEARE, an individual;
RAIN MITCHELL, an individual; on
behalf of themselves, on behalf of all
others similarly situated, and as
aggrieved employees under the
California Private Attorney General
Act,

Plaintiffs,

v.

LULULEMON USA INC., and DOES
1-100, inclusive,

Defendant.

CASE NO. CV 12-9996-SJO (JEMx)

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR FINAL
APPROVAL OF CLASS
SETTLEMENT AND APPROVAL OF
PAGA SETTLEMENT**

DATE: August 14, 2014
TIME: 10:00 a.m.
CTRM.: 1

Assigned to the Honorable S. James Otero

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 14, 2014 at 10:00 a.m. in Courtroom 1 of the United States District Court for the Central District of California, 312 North Spring Street, Los Angeles, California 90012, Plaintiffs will, and hereby do, move this Court for an order granting final approval of the class settlement and the Private Attorneys General Act settlement.

This Motion is made on the grounds that the Parties reached a proposed settlement that is fair, reasonable, and adequate and in the best interests of the Class Members and all Parties. Further, the Parties reached a settlement only after both Parties conducted extensive discovery and a thorough investigation, and engaged in arms-length negotiations that included a day-long mediation session. The Class Members have been notified of the settlement, its terms, and relevant deadlines by the best means practicable, which were reasonably calculated to provide adequate notice and provided notice consistent with due process. The Class Members were provided an opportunity to submit claims, object to the settlement, or request exclusion ("opt out") from the settlement.

The Motion will seek an Order granting the following relief:

1. Finally approving the proposed settlement as fair, reasonable, and adequate under Federal Rule of Civil Procedure 23;
2. Confirming The Law Office of Andrew J. Sokolowski, The Law Offices of Rhett T. Francisco, and the Law Offices of Pawel R. Sasik as Class Counsel;
3. Confirming Plaintiffs Rebekah Geare and Rain Mitchell as Class Representatives for settlement purposes;
4. Finally certifying the Class for settlement purposes;
5. Finding that the Notice was the best practicable notice under the circumstances and satisfied all Constitutional and other requirements; and
6. Entering a Final Order Approving Class Action Settlement and a

1 Final Judgment in substantially the same form as those previously filed

2 This Motion is based on this Notice, the Memorandum of Points and
3 Authorities in support, the Declaration of Andrew J. Sokolowski, the Declaration
4 of Andy Morrison (the representative for the Claims Administrator), other
5 documents on record in this case and any other documents or evidence that the
6 Court may consider at the hearing of this Motion.

7
8 DATED: July 16, 2014

**THE LAW OFFICE OF
ANDREW J. SOKOLOWSKI**

9
10 */s/ Andrew J. Sokolowski*

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